

Petitioner shall respond by **July 12, 2024**, with a memorandum of law not to exceed 10 pages. Respondents shall reply by **July 17, 2024**, with a memorandum of law not to exceed 4 pages. So Ordered.

Dated: July 3, 2024

New York, New York



LORNA G. SCHOFIELD

UNITED STATES DISTRICT JUDGE

UNITED STATES EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Petitioner,

- against -

AAM HOLDING CORP. and 59 MURRAY  
STREET ENTERPRISES, INC., d/b/a  
“FlashDancers Gentleman’s Club,”

Respondents.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**No. 1:24-mc-00103(LGS)**

**NOTICE OF MOTION TO STAY THE  
ACTION PENDING APPEAL TO THE  
SECOND CIRCUIT AND FOR  
WAIVER OF AN APPEAL BOND**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law, Respondents AAM Holding Corp. (“AAM”) and 59 Murray Street Enterprises Inc. (“59 Murray”) (59 Murray and AAM collectively known hereinafter as the “Respondents”) by and through their undersigned counsel, will move this Court before the Honorable Lorna G. S, U.S.D.J. at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, Courtroom 1106, on a date and time designated by the Court, for an order staying enforcement of the Court’s Order (ECF Dkt. No. 18) granting the Petition to enforce the EEOC's subpoena, pending Defendants’ appeal to the United States Court of Appeals for the Second Circuit, and for an order granting waiver of an appeal bond.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, Petitioner's opposition papers must be filed by July 16, 2024, and Respondents' reply must be filed by July 23, 2024.

Dated: July 2, 2024  
New York, New York

Respectfully submitted,

**AKERMAN LLP**

By: /s/ Jeffrey A. Kimmel  
Jeffrey A. Kimmel Esq.  
1251 Avenue of the Americas, 37th Floor  
New York, New York 10020  
jeffrey.kimmel@akerman.com  
*Attorney for Respondents*